

September 10, 2010

FILED ELECTRONICALLY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation
WT Docket No. 02-55
ET Docket Nos. 00-258 and 95-18
New DBSD Satellite Services G.P., Applications for Transfer of Control
File Nos. SAT-T/C-20091211-00144, et al.

Dear Ms. Dortch:

On September 9, 2010, Craig McCaw, Ben Wolff, and R. Gerard Salemme of ICO Global Communications (Holdings) Limited (“ICO Global”) spoke with Commissioner Clyburn and her legal advisor Louis Peraertz regarding the above-captioned proceedings. On September 10th, Mr. Salemme and the undersigned met with Paul de Sa, chief of the Office of Strategic Planning and Policy Analysis, regarding these proceedings.

On the call and in the meeting, we reiterated the points that ICO Global has made in its prior filings and ex parte presentations in these proceedings. In particular, we stressed that it would be improper to consider ICO Global to be part of a single entity with DBSD engaged in the MSS business and thus liable for reimbursing Sprint’s BAS relocation costs. ICO Global and DBSD are separate and distinct in both form and substance. Since its formation in 2005, DBSD (then known as ICO North America) has been separately funded and has relied on its own resources to construct, launch and operate its GEO satellite without any assistance from ICO Global. While there may be limited, fact-specific circumstances in which it is appropriate for the Commission to extend a licensee’s obligations to affiliates of the licensee, this is not one of them. To do so here would also stifle investment by creating a risk for future shareholders in Commission licensees that they could be held liable at some indeterminate future date for the licensee’s obligations.

We also noted that not only would it be legally impermissible to impose liability for relocation costs on ICO Global, it would be grossly unfair. ICO Global (even prior to the formation of DBSD in 2005) never utilized the BAS spectrum or received any benefit from

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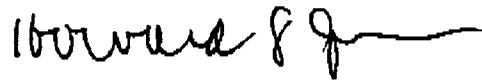
Page 2

Sprint's delayed and inexplicably expensive band clearing activities, and it never will now that it has lost all but a minimal interest in DBSD following DBSD's exit from bankruptcy.

Pursuant to section 1.1206(b) of the Commission's rules, an electronic copy of this letter and attachment is being filed electronically with the Office of the Secretary and served electronically on the Commission participants in the call and meeting.

Should there be any questions regarding this matter, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Howard J. Symons", with a long horizontal flourish extending to the right.

Howard J. Symons

cc: Hon. Mignon Clyburn
Louis Peraertz
Paul de Sa